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8 Attorneys For: Defendant NORTHSTAR LOCATION SERVICES, LLC

9
10 **UNITED STATES DISTRICT COURT**

11
12 **DISTRICT OF NEVADA**

13 NICOLE DIANE LA CARIA, on behalf of herself and all others similarly situated;) CASE NO.: 2:18-cv-00317-GMN-
14) GWF
15) Plaintiff,) *Honorable Gloria M. Navarro*
16) vs.) *Magistrate Judge George Foley, Jr.*
17)) **STIPULATION AND ORDER FOR**
18) **EXTENSION OF TIME FOR**
19) **DEFENDANT NORTHSTAR**
20) **LOCATION SERVICES, LLC TO**
21) **FILE ITS OPPOSITION TO**
22) **PLAINTIFF'S MOTION FOR**
23) **PARTIAL SUMMARY**
24) **JUDGMENT**
25) **[L.R. IA 6-1(b)]**
26) **Current deadline: January 11, 2019**
27) **Proposed deadline: January 25, 2019**
28)

29 **TO THIS HONORABLE COURT:**

30 Defendant Northstar Location Services, LLC (“Northstar”), by and through its
31 undersigned counsel of record, Craig J. Mariam of the law firm of Gordon Rees Scully
32 Mansukhani, LLP, and Plaintiff Nicole Diane LaCaria, by and through her undersigned counsel
33 of record, Keren Gesund of the law firm of Gesund & Pailet, LLC, hereby stipulate and agree to
34 extend the time for Northstar to file its Opposition to Plaintiff’s Partial Motion for Summary
35 Judgment (ECF No. 55), filed on December 21, 2018, from the current deadline of January 11,
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1 2019 to January 25, 2019. The reason for the requested extension is that Plaintiff's Motion for
2 Partial Summary Judgment was filed on the eve of a holiday week and without advanced notice.
3 *See Declaration of Craig J. Mariam in Support of Joint Stipulation for Extension of Time for*
4 *Northstar to File Its Opposition to Plaintiff's Motion for Summary Judgment ("Mariam Decl."),*
5 ¶ 3. As such, due to holiday travel and family commitments, defense counsel needs additional
6 time to prepare the Opposition and obtain the necessary client declarations from Northstar's
7 corporate representatives, who likewise have travel and family commitments during late
8 December 2018 and early January 2019. *Id.*, ¶ 4. A brief 14-day extension is therefore
9 necessary in order to avoid substantial prejudice resulting from having to prepare the Opposition
10 and to obtain the requisite client declarations on short notice during a holiday week. *Id.*, ¶ 5.

11 This is the first stipulation for extension of time for Northstar to file its Opposition to
12 Plaintiff's Motion for Summary Judgment.

13 **IT IS SO STIPULATED.**

14 Respectfully submitted,

15 DATED this 28th day of December 2018.

16 **GORDON REES SCULLY
MANSUKHANI, LLP**

17
18 /s/ Craig J. Mariam
19 Craig J. Mariam, Esq.
Gordon Rees Scully Mansukhani LLP
300 South 4th Street, Suite 1550
20 Las Vegas, Nevada 89101
Attorneys for Defendant
Northstar Location Services, LLC

DATED this 28th day of December 2018.

GESUND & PAILET, LLC

/s/ Keren Gesund
Keren Gesund, Esq.
Gesund & Paillet LLC
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Attorney for Plaintiff
Nicole Diane LaCaria

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ORDER

Pursuant to the foregoing Stipulation, Defendant Northstar Location Services, LLC's time to respond to Plaintiff's Motion for Partial Summary Judgment (ECF No. 55) is extended to January 25, 2019.

IT IS SO ORDERED.

DATED this 8 day of January, 2019.

~~Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT~~

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